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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
1998 Biennial Regulatory Review --	)	
Amendment of Parts 2, 25 and 68 of the	)	
Commission's Rules to Further Streamline the	)	
Equipment Authorization Process for Radio	)	GEN Docket No. 98-68
Frequency Equipment, Modify the Equipment	)	
Authorization Process for Telephone Terminal	)	
Equipment, Implement Mutual Recognition	)	
Agreements and Begin Implementation of the	)	
Global Mobile Personal Communications by	)	
Satellite (GMPCS) Agreements	)	

REPLY COMMENTS OF BELL ATLANTIC[1]

In streamlining the approval process for foreign-manufactured customer premises equipment ("CPE") to be offered in the United States, as most parties urge, the Commission cannot lose sight of the purpose of its Part 68 registration rules. Those rules are designed to prevent customers of United States telecommunications carriers from receiving degraded service as a result of the attachment of non-compliant CPE to the network. Accordingly, while it is appropriate to allow private laboratories to test equipment and to allow qualified foreign-based Telecommunications Certification Bodies to certify that the equipment complies with the Commission's Rules, the Commission

[1] The Bell Atlantic telephone companies ("Bell Atlantic") are Bell Atlantic-Delaware, Inc.; Bell Atlantic-Maryland, Inc.; Bell Atlantic-New Jersey, Inc.; Bell Atlantic-Pennsylvania, Inc.; Bell Atlantic-Virginia, Inc.; Bell Atlantic-Washington, D.C., Inc.; Bell Atlantic-West Virginia, Inc.; New York Telephone Company; and New England Telephone and Telegraph Company.

nonetheless should retain ultimate oversight authority in order to ensure that the public is protected against service degradation from attachment of non-compliant equipment.

As one party points out, allowing private parties that are authorized by foreign certification bodies to test equipment may introduce partiality into the authorization process. Cisco Systems at 8. Another notes that the proposed standards for accrediting foreign certifying bodies are designed to ensure that they have a comprehensive knowledge of Commission rules but do not require that they demonstrate knowledge of the specific type of equipment that they seek to certify. Metricom at 4. Some of the equipment for advanced services is very complex, however, and requires specialized expertise to determine if it meets the provisions of Part 68. *Id.* at 4-5. Therefore, upon request, the Commission should remain in a position to test equipment that has been certified by foreign certification bodies to ascertain whether it does, in fact, comply with its rules and suspend certification if it fails to meet those provisions.

The Commission should also monitor the foreign bodies' testing processes, much as it routinely monitors the activities of domestic private laboratories today. It should require that they provide the Commission with periodic reports of the equipment before them for certification and the results of the tests that they, or private laboratories acting on their behalf, are conducting. These reports should set out the tests that they have performed and the basis on which the foreign certification body has concluded that the equipment meets (or does not meet) the Commission's rules.

In this way, the Commission can streamline the certification process while retaining ultimate authority to oversee and enforce compliance with its rules.

Respectfully Submitted,

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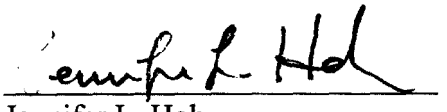
August 26, 1998

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of August, 1998, a copy of the foregoing "Reply Comments of Bell Atlantic" was sent by first class mail, postage prepaid, to the parties on the attached list.



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